

Eric Fryson

From: Kelly, Tamela D [Tamela.Kelly@CenturyLink.com]
Sent: Wednesday, March 14, 2012 4:51 PM
To: Filings@psc.state.fl.us
Cc: Masterton, Susan S; Khazraee, Sandy A
Subject: 110303-OT, CenturyLink's Response to Rule 25-4.0161 Survey Questions
Attachments: 110303-OT, CTL's response Rule 25-4.0161 Survey Questions.pdf

Filed on Behalf of:

Susan S. Masterton
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Embarq Florida, Inc. d/b/a CenturyLink
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Docket No. 110303-OT

Title of filing:

CenturyLink's Response to Rule 25-4.0161 Survey Questions

Filed on behalf of:

Embarq Florida, Inc. d/b/a CenturyLink, Embarq Payphone Services, Inc.,
Embarq Communications, Inc. d/b/a CenturyLink Communications, Madison
River Communications, LLC d/b/a CenturyLink, Qwest Communications
Company, LLC d/b/a CenturyLink QCC, CenturyTel Fiber Company II, LLC d/b/a
LightCore, a CenturyLink limited liability company (collectively referred to as
CenturyLink for ease of responding).

Number Pages: 4 pages

Description: CenturyLink's Response to Rule 25-4.0161 Survey Questions
(Relating to Regulatory Assessment Fees)

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FPSC-COMMISSION CLERK



March 14, 2012

Judy Harlow
c/o Ms. Ann Cole
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RE: 110303-OT – CenturyLink’s response to Rule 25-4.0161, F.A.C., Survey Questions

Dear Ms. Harlow:

Enclosed for filing on behalf of Embarq Florida, Inc. d/b/a CenturyLink, Embarq Payphone Services, Inc., Embarq Communications, Inc. d/b/a CenturyLink Communications, Madison River Communications, LLC d/b/a CenturyLink, Qwest Communications Company, LLC d/b/a CenturyLink QCC, CenturyTel Fiber Company II, LLC d/b/a LightCore, a CenturyLink limited liability company (collectively referred to as CenturyLink for ease of responding). Attached is CenturyLink’s response to Staff’s memo dated February 24, 2012 regarding Rule 25-4.0161, F.A.C., Survey Questions.

If you have any questions regarding CenturyLink’s response please contact Harvey Spears at 850/599-1401 or harvey.spears@centurylink.com.

Sincerely,

Handwritten signature of Susan S. Masterton in cursive.
Susan S. Masterton

Enclosures

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FPSC-COMMISSION CLERK

Embarq Florida, Inc. d/b/a CenturyLink, Embarq Payphone Services, Inc., Embarq Communications, Inc. d/b/a CenturyLink Communications, Madison River Communications, LLC d/b/a CenturyLink, Qwest Communications Company, LLC d/b/a CenturyLink QCC, CenturyTel Fiber Company II, LLC d/b/a LightCore, a CenturyLink limited liability company (collectively referred to as CenturyLink for ease of responding)

Rule 25-4.0161, F.A.C. – Survey Questions

The following survey questions apply to **Rule 25-4.0161, F.A.C., Regulatory Assessment Fees; Telecommunications Companies**. For responding to these questions, please refer to Subsection 120.541(2), F.S., and Subparagraph 120.745(1)(b)2, F.S. “Transactional costs” are defined in Subparagraph 120.541(2)(d), F.S., as:

...direct costs that are readily ascertainable based upon standard business practices, including filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used or procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring and reporting, and any other costs necessary to comply with the rule.

The company’s response data to these survey questions should be provided for the entire rule, unless the response data is available by rule section, in which case we request the response data be provided by rule section. Please present data in annualized format, if possible, and all cost or benefit dollar estimates should be stated in nominal terms.

1. What are the estimated transactional costs resulting from the Company’s compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Response: The costs associated with the Company’s compliance with the rule have not been evaluated.

a. What are your actual transactional costs resulting from your Company’s compliance with Rule 25-4.0161, F.A.C., for the period July 1, 2011 through December 31, 2011?

Response: CenturyLink does not track costs associated with adherence to the current rule; therefore, no specific data is available.

2. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small businesses (as defined by Section 288.703, F.S.) located in the Company’s service territory, resulting from the compliance of Rule 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Response: Unknown

3. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on small counties and small cities (as defined in Section 120.52, F.S.) located in the Company’s service territory, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Response: Unknown

4. What is your estimate of the likely impact, stated in terms of costs and/or benefits, on entities located in the Company's service territory other than those specifically identified in Questions 2 and 3, resulting from the compliance of 25-4.0161, F.A.C., for the five year period beginning July 1, 2011?

Response: Unknown

5. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on economic growth, private sector job creation or employment, and private sector investment for the five year period July 1, 2011 in the Company's service territory?

Response: Unknown

6. What expected impact do you believe Rule 25-4.0161, F.A.C., will have on business competitiveness, including the ability of persons doing business in the Company's service territory to compete with persons doing business in states other than Florida or other domestic markets, productivity, and innovation, for the five year period July 1, 2011?

Response: To the extent the Company incurs regulatory costs that its competitors do not, the Company may be competitively disadvantaged. To the extent the Company passes those costs onto its customers, including its business customers, those customers may be disadvantaged as compared to customers of competitors that do not incur these regulatory costs.

7. What are the benefits to your Company associated with Rule 25-4.0161, F.A.C.?

Response: No direct benefit.

8. Since the December 4, 2011 rule change has your Company revised customer rates in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any rate changes that were made.

Response: None specific to the rule change.

9. If the Company did revise customer rates after the rule change, what were the specific costs associated with processing and implementing these rate changes?

Response: Not Applicable

10. Does the Company anticipate having to revise customer rates in the future in order to comply with Rule 25-4.0161, F.A.C.? If so, please explain any anticipated rate changes for the five year period beginning July 1, 2011.

Response: No

11. If the company anticipates revising customer rates in order to comply with Rule 25-4.0161, F.A.C., what costs does the company expect to incur to process and implement the rate changes for the five year period beginning July 1, 2011?

Response: Not Applicable